

**The Honorable Barbara J. Rothstein**

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

WILLIAM T. WHITMAN, individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

STATE FARM LIFE INSURANCE COMPANY,  
an Illinois corporation

Defendant.

No. 3:19-cv-06025-BJR

[PROPOSED] ORDER GRANTING  
DEFENDANT'S MOTION FOR LEAVE TO  
FILE DOCUMENTS UNDER SEAL

Upon the motion of Defendant to file under seal certain confidential documents and information, it is hereby ORDERED that the motion is GRANTED and the following documents shall be filed under seal:

1. Expert Report of Rebecca Kirk Fair (Exhibit A to the Declaration of Rebecca Kirk Fair)

2. Exhibit 1 to the Expert Report of Rebecca Kirk Fair: Summary of State Farm Washington Form 94030 Policyholder Data
3. Exhibit 2 to the Expert Report of Rebecca Kirk Fair: Summary of State Farm Washington Form 94030 Policyholder Data
4. Exhibit 3 to the Expert Report of Rebecca Kirk Fair: Summary of State Farm Washington Form 94030 Policyholder Data
5. Expert Report of Lauren J. Stiroh (Exhibit A to the Declaration of Lauren J. Stiroh)
6. Exhibit 3 to the Expert Report of Lauren J. Stiroh: analysis of Plaintiff's damages model that contains confidential policyholder data.
7. Exhibits 4-8 to the Expert Report of Lauren J. Stiroh: illustrations of the comparative COI rates and alleged damages for certain policies
8. Expert Report of Craig Reynolds (Exhibit A to the Declaration of Craig Reynolds)
9. Exhibit A to the Declaration of Alan Hendren: 94000 Series pricing binder
10. Exhibit B to the Declaration of Alan Hendren: State Farm's mortality table from the relevant timeframe
11. Exhibit C to the Declaration of Alan Hendren: filing package to Illinois including the nationwide actuarial memorandum.
12. Exhibit D to the Declaration of Alan Hendren: correspondence to Illinois enclosing a revised sample annual statement showing planned cost of insurance rate information and expense charges.
13. Exhibit F to the Declaration of Alan Hendren: filing package to Washington including the actuarial memorandum

- 1 14. Exhibit G to the Declaration of Alan Hendren: actuarial memorandum State Farm
- 2 submitted to New Jersey providing a description of the process that State Farm's
- 3 actuaries followed to develop the cost of insurance rates for use with the 94030 Policy
- 4 15. Exhibit J to the Declaration of Alan Hendren: 1994 version of the rate book that was
- 5 in place when Plaintiff purchased his Policy
- 6 16. Exhibit A to the declaration of Tim Crabtree: Summary of policyholder data
- 7 17. Declaration of Monica Flory
- 8 18. Exhibit 1 to the Declaration of Cari Dawson: Deposition Transcript of Plaintiff
- 9 William Whitman
- 10 19. Exhibit 3 to the Declaration of Cari Dawson: Exhibit 11 to the Deposition Transcript
- 11 of Plaintiff William Whitman (certain Annual Notices of Policy Status)
- 12 20. Exhibit 6 to the Declaration of Cari Dawson: Exhibit 15 to the Deposition Transcript
- 13 of Plaintiff William Whitman (Email communication between Plaintiff and Monica
- 14 Flory)
- 15 21. Exhibit 7 to the Declaration of Cari Dawson: Exhibit 28 to the Deposition Transcript
- 16 of Plaintiff William Whitman (Email communication from Plaintiff to himself)
- 17 22. Exhibit 9 to the Declaration of Cari Dawson: Exhibit 29 to the Deposition Transcript
- 18 of Plaintiff William Whitman (Email communication from Plaintiff to himself)
- 19 23. Exhibit 11 to the Declaration of Cari Dawson: Deposition Transcript of Plaintiff's
- 20 Expert Scott Witt.

21 In connection with its Opposition to Plaintiff's Motion for Class Certification, Defendant

22 has filed documents and information that Defendant considers to be proprietary and confidential,

23 as well information that is confidential and personal to Plaintiff. Sealing is necessary to protect

1 the confidentiality of such information.

2 The above documents shall remain sealed unless and until they become publicly available  
3 or de-designated as “Confidential” under the existing Protective Order in this case or by any  
4 Court Order.

5 IT IS SO ORDERED.

6 Dated this \_\_\_\_ day of \_\_\_\_\_, 2021.

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8 **Honorable Barbara J. Rothstein**  
9 UNITED STATES DISTRICT JUDGE  
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Presented by:

DATED: March 29, 2021

BETTS, PATTERSON & MINES, P.S.

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/s/ Kara A. Tredway

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